BROWN GAVALAS & FROMM LLP

505 FIFTH AVENUE NEW YORK, NEW YORK 10017 TEL: (212) 983-8500 FAX: (212) 983-5946 www.browngavalas.com bgmail@browngavalas.com

NEW JERSEY OFFICE

1118 CLIFTON AVENUE CLIFTON, NJ 07013 TEL: (973) 779-1116 FAX: (973) 779-0739

HARRY A. GAVALAS (1978-1999) ROBERT J. SEMINARA (1987-1999)

December 17, 2019

VIA ECF

The Honorable Ronnie Abrams United States District Judge United States District Court Southern District of New York 40 Foley Square, Room 2203 New York, NY 10007

Re: Great Lakes Insurance SE v. American Steamship Owners Mutual

Protection and Indemnity Association Inc., et al.

Case No.: 1:19-cv-10656-RA-SLC

Our File: 1545.0083

Dear Judge Abrams:

We are counsel for Defendants, American Steamship Owners Mutual Protection & Indemnity Association, Inc. (the "Association") and Shipowners Claims Bureau, Inc. ("SCB," collectively with the Association the "American Club"), in the above-referenced action. We write with respect to Your Honor's December 10, 2019 Order [Dkt. 18] concerning the sealing of certain exhibits to the American Club's motion to dismiss.

On December 12, 2019, the American Club filed its pre-answer Motion to Dismiss the Complaint (the "Motion"). [Dkts. 19-21] The American Club did not submit any exhibits to the Motion that it seeks to have sealed. The American Club believes the Motion stands on its own and, as a result, at this time, it is not necessary to submit the protected confidential documents as exhibits.

Accordingly, the American Club is not currently seeking to submit any documents under seal. Should the American Club seek to file any documents under seal in the future, the American Club will provide the Court with the reasoning for why, under the standard set forth in *Lugosch v Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006), sealing such

Case 1:19-cv-10656-RA Document 24 Filed 12/17/19 Page 2 of 2

BROWN GAVALAS & FROMM LLP

Judge Ronnie Abrams December 17, 2019 Page 2

documents would be justified.

Respectfully submitted,

BROWN GAVALAS & FROMM LLP

Robert J. Brown

cc: Counsel of Record (via ECF)